REMARKS

Claims 1-4 and 6-10 are pending in the application. Claims 2, 3, 7, 8 and 10 have been amended. Claim 5 was previously canceled have been canceled without prejudice or disclaimer. Reconsideration of this application is respectfully requested.

The Office Action rejects claim 2 under 35 U.S.C. 102(b) as anticipated by U.S. Patent No. 6,310,921 to Yoshioka et al., hereafter Yoshioka.

This rejection is respectfully traversed. Claim 2 has been amended to recite:

> (e) "generating a first selection signal which signals whether prediction data for a prediction process resides in a primary memory in part or in whole, wherein said primary memory is dedicated to storage of prediction data".

Support for this amendment is in the specification at page 11, lines 23-26.

The Examiner reads the primary memory on FIFO buffer 4 of Yoshioka. Buffer 4 is used to store coded current data frames that are being presented for decoding and not prediction data as recited in amended claim 2. Since Yoshioka's FIFO buffer 4 is used to store the current coded frames, it is not dedicated to the storage of prediction data. Therefore, Yoshioka lacks the claimed primary memory, selection signals and prediction signal.

The Examiner contends that the motion vector data included in the I frames resides in FIFO buffer 4. However, this contention is moot in view of the amendment.

It is further noted that Yoshioka's pixel read/write unit retrieves motion vector data of reference frames stored in external memory 3 to perform "MC on the processing result" (column 14, lines 35-45). This is the type of activity that the claimed invention is minimizing to decrease the amount of traffic to the external memory.

For the reason set forth above, it is submitted that the rejection of claim 2 under 35 U.S.C. 102(b) as anticipated by Yoshioka is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 1, 3, 4, 6, 7 and 10 under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 5,675,387 to Hoogenboom et al., hereafter Hoogenboom in view of Yoshioka.

This rejection is respectfully traversed.

With respect to claim 1, which recites an encoding method, Hoogenboom discloses only a decoding method and not an encoding method. Therefore, Hoogenboom does not disclose or teach any of the recited method steps. The Examiner admits that Hoogenboom does not disclose or teach a primary memory in addition to the external memory, but contends that Yoshioka teaches FIFO buffer 4 as a primary memory. The Examiner concludes that it would have been obvious to one of ordinary skill in the art to modify Hoogenboom to include Yoshioka's FIFO buffer 4 and the claimed primary memory.

This suggested combination of Hoogenboom and Yoshioka merely provides a decoding method and not the claimed encoding method. Therefore, claim 1 is unobvious over the combination of Hoogenboom and Yoshioka.

Claim 3 has been amended to recite:

"transmitting signals to and receiving signals from a primary memory, which is dedicated for storage of previously decoded reference data frames obtained from an external memory, and wherein said signals retrieve selected ones of said previously decoded reference data frames".

Claim 10 has been similarly amended. Support for this amendment is in the specification at page 7, lines 28-30, page 8, line 5, and page 11, lines 23-26.

The Examiner admits that Hoogenboom does not disclose "transmitting signals to and receiving signals from a primary memory for storage of data frames being decoded currently". The Examiner contends that Yoshioka's FIFO buffer 4 provides Hoogenboom's deficiency.

This contention is moot in view of the amendment. The quoted recital of claim 3 recites that the primary memory "is dedicated for storage of previously decoded reference data frames obtained from an external memory". Yoshioka's FIFO buffer 4 is not dedicated for storage of "previously decoded reference data frames obtained from an external memory", but rather store current encoded data frames. Therefore, Yoshioka does not supply Hoogenboom's deficiency and amended claims 3 and 10 are unobvious in view of the combination of Hoogenboom and Yoshioka.

Claims 3 and 10 further recite:

"searching said primary memory for a best match between a current one of said data frames and said previously decoded data frames, wherein step (a) uses said best match to provide motion compensation".

Neither Hoogenboom nor Yoshioka discloses the recited step of searching the primary memory for the best match. Therefore, for this additional reason

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amended claims 3 and 10 are unobvious over the combination of Hoogenboom and Yoshioka.

Claims 4 and 7 recite that the "primary memory is dedicated to a motion compensation function of data decoding". Yoshioka's buffer 4 is not dedicated to a motion compensation function. Therefore, claim 4, its dependent claim 6 and claim 7 are unobvious over the combination of Hoogenboom and Yoshioka.

Claim 7 has been amended to correct an informality by inserting the article "a" before "motion compensator".

For the reason set forth above, it is submitted that the rejection of claims 1, 4, 6 and 7 under 35 U.S.C. 103(a) is erroneous and that the rejection of claims 3 10 under 35 U.S.C. 103(a) is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 8 and 9 under 35 U.S.C 103(a) as unpatentable over U.S. Patent No. 5,576,767 to Lee et al., hereafter Lee, in view of Yoshioka.

Claim 8 has been amended to correct an informality by inserting "and" after motion estimator in part (d).
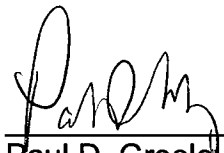
This rejection is erroneous. The Examiner admits that Lee does not disclose a primary memory model coupled to a motion estimator, but contends that Yoshioka's FIFO buffer 4 satisfies Lee's deficiency. However, Yoshioka's FIFO buffer 4 of Fig. 1 is in a decoder and not an encoder. Therefore, one of ordinary skill in the art would not be inclined to modify Lee's encoder with FIFO buffer 4 of Yoshioka's decoder. Therefore, the suggested combination of Lee and Yoshioka is erroneous.

For the reason set forth above, it is submitted that the rejection of claims 8 and 9 and under 35 U.S.C. 103(a) is erroneous and should be withdrawn.

It is respectfully requested for the reasons set forth above that the rejections under 35 U.S.C. 102(b) and 35 U.S.C. 103(a) be withdrawn, that claims 1-10 be allowed and that this application be passed to issue.

Respectfully Submitted,

Date:_____9|5|08_____

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